

## FOR THE DISTRICT OF DELAWARE

KNOWLINGTON O, BURBAGE  
plaintiff,

vs.

CITY OF WILMINGTON, DELAWARE  
et, al  
defendant,

CASE, NO. 04-133-SLR



## MOTION TO AMEND

COMES Now the plaintiff, KNOWLINGTON O, BURBAGE of being Pro-Se ask's this Honorable Court to Grant this Motion to Amend the Complaint as for grounds THEREOF;

1). On MARCH 02, 2004, plaintiff, KNOWLINGTON O, BURBAGE filled a complaint, pursuant to ( TITLE 42 U.S.C.A. § 1983 ).

2)0 The complaint ( TITLE 42 U.S.C.A. § 1983 ) was against the CITY OF WILMINGTON DELAWARE et, al for the violation of his CIVIL / CONSTITUTIONAL RIGHTS GOVERNED by the UNITED STATES of AMERICA.

3). The plaintiff states that since he has no education / schooling in Law, and is not an advocate off the court, he overlooked certain important issues and facts, that are relevant to this / his case and complaint.

4). In observation of the complaint and case, the plaintiff notes, that this is based strongly on CONSTITUTIONAL VIOLATIONS, and ask's this HONORABLE COURT THAT HE MAY ADD / INCOPORATE the true core of the complaint, that will set out the Violation Committed.

WHEREFORE ; The plaintiff ask's and prays this HONORABLE COURT GRANT this Motion to Amend the Complaint, so, that the plaintiff can not only show cause, but demonstrate the constitutional violations that accrued.

PROOF OF SERVICE

I, KNOWLINGTON O, BURBAGE, certify that on May 16, 2005, 2005 I mailed a copy of this document and all attachments via first class mail to the following parties at the addresses below;

CLERK OF COURTS  
UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELEWARE  
844 NORTH KING ST.  
LOCK BOX 18  
WILMINGTON, DELEWARE 19801

ROSAMARIA TASSONE, ESQUIRE  
ASSISTANT CITY SOLICITOR  
CITY OF WILMINGTON LAW DEPARTMENT  
800 N. FRENCH ST. 9TH FLOOR  
WILMINGTON, DELEWARE 19801  
I.D. #3546

PROOF OF SERVICE FOR INCARCERATED LITIGANTES

In addition to the above proof of service, all litigants who are currently incarcerated should include the following statements with all documents to be filed with court;

I certify that this document was given to officials on this date for forwarding to the UNITED STATES DISTRICT COURT CLERK OF DISTRICT OF DELAWARE, and ROSAMARIA TASSONE, ESQ. I futher certify under penalty of perjury that the foregoing is true and correct. TITLE 28 U.S.C. §1746

RESPECTFULLY SUBMITTED THIS 16<sup>th</sup> day of May, 2005



KNOWLINGTON O, BURBAGE  
F.P.C. FAIRTON  
REG # 21524-051  
P.O. BOX 420  
FAIRTON, NEW JERSEY 08320

PLEADINGS BY PRISONERS WHO REPRESENT THEMSELVES ARE TO BE FILED AT THE MOMENT SUCH PLEADINGS ARE DELIVERED TO PRISON AUTHORITIES FOR FORWARDING TO CLERK ( HOUSTON V. LACK 487 U.S. 266 ( 1988 ) ).

DATE: May 16, 2005

P.S. i.e.

EMPHASIS ADDED: CITING HAINES V, KERNER 30. LEd,2d 652  
the SUPREME COURT HELD THAT: under Pleading § 130 Pro-Se complaint holds  
allegations of a pro-se complaint to less stringent standards than formal  
pleadings drafted by lawyers.

SUBSCRIBED and SWORN to before this \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_\_  
I am \_\_\_\_\_ NOTARY PUBLIC  
My Commission Expires; \_\_\_\_\_



KNOOLLINGTON O, BURABGE  
REG # 21524-051  
F.P.C. FAIRTON  
P.O. BOX 420  
FAIRTON, NEW JERSEY 08320

CLERK OF COURTS OF THE  
UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE  
344 NORTH KING ST.  
LOCKBOX 18  
MAY 25 2005, 10:20 AM  
U.S. POSTAL SERVICE